

EXHIBIT 20



HAGENS BERMAN
SOBOL SHAPIRO LLP

JENIPHR A.E. BRECKENRIDGE
DIRECT • (206) 224-9325
JENIPHR@HBSLAW.COM

September 30, 2005

Via Facsimile

Mr. Jason Litow
Mr. Ron Dove
Covington & Burling
1201 Pennsylvania Avenue, N.W.
Washington, DC 20044-7566

Re: Nevada AWP Litigation

Dear Jason:

We have reviewed your September 23, 2005 letter to prepare for today's telephone conference. We have an important correction to your account of last week's call. The State of Nevada did *not* agree to search for and produce pre-1991 information. We indicated that due to State document and retention policies, it is unlikely that such documents would still exist. We agreed to accept a list of specific pre-1991 documents defendants in which defendants are interested and to *consider* searching for those specific documents alone. Similarly, the State did *not* agree to produce "any other relevant reports or documents discovered in the course of the search for an identified report." I have confirmed this recollection of the call with David Nalven.

The State's position regarding pre-1991 discovery has not changed. Any agreement to produce information from the earlier time period must be bilateral.

Sincerely,

HAGENS BERMAN SOBOL SHAPIRO LLP

Jeniphr A.E. Breckenridge

cc: David Nalven
L. Timothy Terry

ATTORNEYS AT LAW

SEATTLE LOS ANGELES CAMBRIDGE PHOENIX CHICAGO

T 206.623.7292 F 206.623.0594

www.hagens-berman.com